

FOX ROTHSCHILD LLP  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
(702) 262-6899  
(702) 597-5503 (fax)

BRETT A. AXELROD, ESQ.  
Nevada Bar No. 5859  
NICHOLAS A. KOFFROTH, ESQ.  
Nevada Bar No. 16264  
ZACHARY T. WILLIAMS, ESQ.  
Nevada Bar No. 16023  
**FOX ROTHSCHILD LLP**  
1980 Festival Plaza Drive, Suite 700  
Las Vegas, Nevada 89135  
Telephone: (702) 262-6899  
Facsimile: (702) 597-5503  
Email: baxelrod@foxrothschild.com  
nkoffroth@foxrothschild.com  
zwilliams@foxrothschild.com  
*Counsel for Debtor*

**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEVADA**

In re

CASH CLOUD, INC.,  
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**NOTICE OF MOTION FOR ORDER  
EXTENDING DEADLINE TO ASSUME,  
ASSUME AND ASSIGN, OR REJECT  
UNEXPIRED NONRESIDENTIAL REAL  
PROPERTY LEASES PURSUANT TO 11.  
U.S. C. § 365(D)(4)**

Hearing Date: June 5, 2023

Hearing Time: 10:30 a.m.

**PLEASE TAKE NOTICE** that on May 8, 2023, Cash Cloud, Inc. dba Coin Cloud (“Debtor”), debtor and debtor in possession in the above-captioned case (the “Chapter 11 Case”), filed a *Motion for Order Extending Deadline to Assume, Assume and Assign, or Reject Unexpired Nonresidential Real Property Leases Pursuant to 11. U.S. C. § 365(d)(4)* [Docket No. 534] (the “Motion”).<sup>1</sup>

<sup>1</sup> Capitalized terms not defined herein shall the meanings assigned to them in the Motion.

1 **PLEASE TAKE FURTHER NOTICE** that a hearing on the Motion will be held at  
 2 **10:30 a.m. prevailing Pacific Time on June 5, 2023**, before the Honorable Mike K. Nakagawa,  
 3 United States Bankruptcy Judge, the Foley Federal Building, 300 Las Vegas Boulevard South,  
 4 Courtroom No. 2, Las Vegas, Nevada.

5 **NOTICE IS FURTHER GIVEN** that the hearing will be held remotely. Parties are  
 6 permitted to appear telephonically by dialing (669) 254-5252 and entering meeting ID 161 062 2560  
 7 and entering access code or passcode 029066#.

8 **NOTICE IS FURTHER GIVEN** that if you do not want the court to grant the relief sought,  
 9 or if you want the court to consider your views on the Motion, then you must file an opposition with  
 10 the Bankruptcy Court, and serve a copy as instructed below.

11 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading  
 12 with the court. You *must* also serve your written response on the person who sent you this notice.

13 If you do not file a written response with the court, or if you do not serve your written  
 14 response on the person who sent you this notice, then:

- 15 • The court may *refuse to allow you to speak* at the scheduled hearing; and
- 16 • The court may *rule against you* without formally calling the matter at the hearing.

17  
 18 **PLEASE TAKE FURTHER NOTICE** that the deadline to file and serve objections to the  
 19 Motion is **May 31, 2023** (the "Objection Deadline"). Any objection to the Motion must: (i) be in  
 20 writing; (ii) conform to the Bankruptcy Rules and the Local Rules; (iii) set forth the name of the  
 21 objector, the nature and amount of claims or interests held or asserted by the objector against the  
 22 Debtor's estate or property, the basis for the objection and the specific grounds therefor, set forth all  
 23 relevant facts and legal authority, and be supported by affidavits or declarations that conform to Local  
 24 Rule 9014(c); (iv) be served via electronic mail, personal service or overnight delivery upon:  
 25 (a) counsel to Debtor, Fox Rothschild LLP, 1980 Festival Plaza Drive, Suite 700, Las Vegas, Nevada  
 26 89135, Attn: Brett Axelrod; (b) counsel to the Committee of Unsecured Creditors, (i) Seward & Kissel  
 27 LLP, One Battery Park Plaza, New York, New York 10004, Attn: John R. Ashmead and Robert J.  
 28 Gayda, and (ii) McDonald Carano Wilson LLP, 2300 W. Sahara Ave., Suite 1200, Las Vegas, NV

89102 Attn: Ryan J. Works, and (c) the Office of the United States Trustee, 300 Las Vegas Boulevard S., Suite 4300, Las Vegas, NV 89101, Attn: Jared A. Day; and (v) be filed with the Clerk of the United States Bankruptcy Court for the District of Nevada, in each case so as to be received no later than the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that copies of the Motion and supporting pleadings are available: (a) electronically through the Court's CM/ECF system at <http://ecf.nvb.uscourts.gov> (PACER account required); (b) electronically on the following website: <https://cases.stretto.com/CashCloud>; or (c) by contacting Debtor's counsel, Fox Rothschild, LLP, 1980 Festival Plaza Drive, Suite 700, Las Vegas, Nevada 89135; telephone: (702) 262-6899; Attn: Patricia Chlum, Paralegal, email: [pchlum@foxrothschild.com](mailto:pchlum@foxrothschild.com).

Dated this 11th day of May, 2023.

**FOX ROTHSCHILD LLP**

By /s/Brett A. Axelrod  
 BRETT A. AXELROD, ESQ.  
 Nevada Bar No. 5859  
 NICHOLAS A. KOFFROTH, ESQ.  
 Nevada Bar No. 16264  
 ZACHARY T. WILLIAMS, ESQ.  
 Nevada Bar No. 16023  
 1980 Festival Plaza Drive, Suite 700  
 Las Vegas, Nevada 89135  
*Counsel for Debtor*

FOX ROTHSCHILD LLP  
 1980 Festival Plaza Drive, Suite 700  
 Las Vegas, Nevada 89135  
 (702) 262-6899  
 (702) 597-5503 (fax)